

**IN THE UNITED STATE DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION**

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LOLITA PENNINGTON, INDIVIDUALLY  
AND AS REPRESENTATIVE OF THE  
ESTATE AND WRONGFUL DEATH  
BENEFICIARIES OF ANDRIANA HALL,  
ANDRE LAMONT HALL,  
ASHLEY HALL, EBONI DABNEY, and  
SANDRA DABNEY, AS NEXT FRIEND  
TO J.J.D. AND J.R.D., MINORS

Plaintiffs,

v.

Civil Action Number: 3:16-cv248-NBB-JMV

SHARANJIT PARMAR,  
PARMAR TRUCKLINES,  
UPS GROUND FREIGHT INC  
A/K/A UNITED PARCEL SERVICE,

Defendants.

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**AFFIDAVIT OF RODNEY D. ELLIS II.**

RODNEY D. ELLIS II., being first duly sworn, deposed and states:

1. My name is Rodney D. Ellis II. I reside in Dripping Springs, Texas. I am an adult, competent to testify, and have personal knowledge of the facts recited in this affidavit.

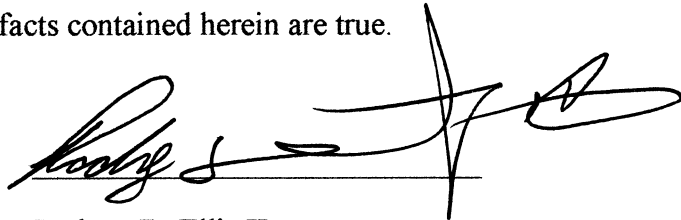
2. I have been retained by Plaintiffs' counsel, in the case of Lolita Pennington, et. al. v. UPS Ground Freight, Inc., et. al. as a safety consultant and expert witness in regards to the April 14, 2016 accident involving Andriana Hall.

3. I previously provided to counsel for Plaintiffs the date of February 21, 2018, when I could be made available for deposition at the offices of Plaintiffs' counsel in Dallas, TX.

4. On December 6, 2017, counsel for Defendant UPS Ground Freight, Inc., noticed my deposition for December 11, 2017 at the offices of Bridgeforth and Buntin, PLLC in Southhaven, MS.

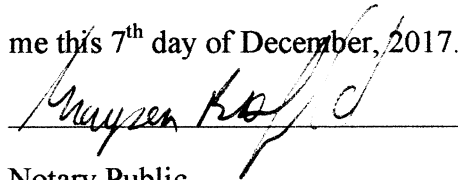
5. I did not agree to availability for a December 11, 2017 deposition date and, due to such sudden notice, cannot be available at that time. I also did not agree to the location.

I am competent to make this affidavit and facts contained herein are true.



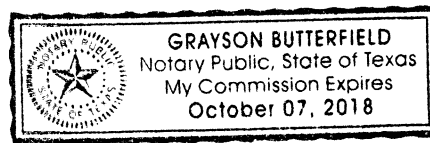
Rodney D. Ellis II

Subscribed and sworn to before  
me this 7<sup>th</sup> day of December, 2017.



Notary Public

In and For the State of Texas



My commission expires: 10-7-2018